

KELLER BENVENUTTI KIM LLP
JANE KIM (Cal. Bar No. 298192)
(jkim@kbkllp.com)
JEREMY V. RICHARDS (Cal. Bar No. 102300)
(jrichards@kbkllp.com)
425 Market Street, 26th Floor
San Francisco, California 94105
Telephone: (415) 496-6723
Facsimile: (650) 636-9251

*Proposed Attorneys for Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:
TRINITAS ADVANTAGED
AGRICULTURE PARTNERS IV, LP *et al.*,¹
Debtors.

Case No. 24-50211 (DM) (Lead Case)
Chapter 11

**NOTICE OF FILING OF PROPOSED
INTERIM ORDER (I) APPROVING
MOTION OF THE DEBTORS TO
OBTAIN SENIOR SECURED,
SUPERPRIORITY, POSTPETITION
FINANCING; (II) GRANTING LIENS
AND SUPERPRIORITY CLAIMS;
(III) AUTHORIZING THE USE OF
CASH COLLATERAL;
(IV) MODIFYING THE AUTOMATIC
STAY; (V) SETTING A FINAL
HEARING; AND (VI) GRANTING
RELATED RELIEF**

Date: March 7, 2024
Time: 11:30 a.m. (Pacific Time)
Place: Tele/Videoconference
Appearances Only
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

¹ The last four digits of Trinitas Advantaged Agriculture Partners IV, LP's tax identification number are 3730. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://www.donlinrecano.com/trinitas>. The Debtors' service address is 2055 Woodside Road, Suite 195, Redwood City, CA 94061.

TO THE UNITED STATES BANKRUTPCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on February 19, 2024 (the “Petition Date”), Trinitas Advantaged Agriculture Partners IV, LP; Trinitas Farming, LLC; Dixon East LLC; Turf Ranch LLC; Rasmussen LLC; Johl LLC; Chiala LLC; Hall Ranch LLC; Dinuba Ranch, LLC; Porterville LLC; Tule River Ranch, LLC; Jeffrey Ranch, LLC; Toor Ranch, LLC; Lamb Ranch, LLC; Fry Road, LLC; Adobe Ranch, LLC; Marcucci Ranch, LLC; Ratto Ranch, LLC; and Phelps Ranch, LLC (collectively, the “Debtors”), as debtors and debtors in possession in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Northern District of California (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, also on February 19, 2024, the Debtors filed the *Motion of Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing; (II) Granting Liens and Superpriority Claims; (III) Authorizing the Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Setting a Final Hearing; and (VI) Granting Related Relief* (the “DIP Motion”) [Dkt. No. 12].²

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has set a hearing (the “Hearing”) to consider the interim relief requested in the DIP Motion on **March 7, 2024, at 11:30 a.m.** (Prevailing Pacific Time), before the Honorable Dennis Montali, United States Bankruptcy Judge. **The Hearing shall be conducted by video or teleconference only.** The Bankruptcy Court’s website provides information regarding how to arrange an appearance at a video or telephonic hearing. If you have questions about how to participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website at www.canb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that at the Hearing, the Debtors will seek entry of the interim order (the “Interim Order”) attached hereto as **Exhibit A**, authorizing the Debtors to, *inter alia*: (i) borrow under the DIP Facility and use Cash Collateral during the period commencing on the Petition Date through and including the earlier of (a) the date of entry of a final order and (b) the occurrence of a DIP Termination Event, in accordance with the terms of the Third Interim Order, the DIP Credit Agreement, and the Approved Budget; and, (ii) enter into, execute, deliver, and perform all obligations under the DIP Credit Agreement.

PLEASE TAKE FURTHER NOTICE that a redline comparison of the proposed Interim Order against the original proposed order filed as an exhibit to the DIP Motion is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that at the Hearing, the Debtors also will request that the Court set a final hearing to consider entry of a final order granting the relief requested in the DIP Motion on a final basis.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the DIP Motion or the DIP Credit Agreement, as applicable.

1 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings in these
2 Chapter 11 Cases can be viewed and/or obtained by: (i) accessing the Court's website at
3 <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden
4 Gate Avenue., 5th Floor, San Francisco, California 94102, or (iii) from the Debtors' proposed
5 notice and claims agent, Donlin, Recano & Company, Inc. at the following web address:
6 <https://www.donlinrecano.com/trinitas>, or by calling the restructuring information center at
7 1 (800) 780-7386 (toll free) for U.S. and Canada-based parties or 1 (212) 771-1128 for
8 International parties, or by submitting an inquiry via e-mail to tfinfo@drc.equiniti.com.

9 Note that a PACER password is needed to access documents on the Court's website.

10 Dated: March 1, 2024

11 **KELLER BENVENUTTI KIM LLP**

12 By: /s/ Jane Kim

13 Jane Kim

14 *Proposed Attorneys for Debtors and
15 Debtors in Possession*

16 **KELLER BENVENUTTI KIM LLP**
17 425 MARKET STREET, 26TH FLOOR
18 SAN FRANCISCO, CALIFORNIA 94105